

**UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF VERMONT**

UNITED STATES OF AMERICA)
)
)
v.) No. 5:18-cr-61-1-2
)
)
SAM BENT and)
DJENEBA BENT,)
Defendants.)

DEFENDANT'S MOTION TO SUPPRESS AND REQUEST FOR FRANKS HEARING:
EXHIBIT INDEX

ATT. #	EX. #	DESCRIPTION
3	A	Picture of Envelope addressed to Sam Bent at P.O. Box 22 with return address KR Property C/Castano 79, 2 29651, Mijas Cost, Malaga, Espana (Bates #00000544). Seized and searched pursuant to 03/29/2018 Extended Border Search.
4	B	5/14/2018 ROI No. NT13LR18NT00001-004: Information Received from the Orleans, VT Post Office (Bates #00000068-69).
5	C	4/3/2017 Application for Search Warrant and Affidavit to search Six Parcels (Bates #00000218-235).
6	D	5/14/2018 ROI No. NT13LR18NT001-006: Search of Abandoned Trash at 3585 Darling Hill Rd East Burk, VT (Bates #00000073-75).
7	E(1)	<i>Heroin: An Increasing National Threat</i> , Sirchie NARK NEWS, Volume 9 (June 2015).
8	E(2)	<i>Heroin ... Fentanyl -What do we have?</i> , Sirchie NARK NEWS, Volume 6 (August 2013).
9	E(3)	<i>Narcotics Investigation</i> , Sirchie Forensics (2017).
10	E(4)	Sirchie; <i>NARK II Narcotics Analysis Reagent Kit</i> , Operators Manual
11	E(5)	Sirchie Fentanyl Reagent product description and photographs.
12	F	Photograph of completed Special Opiates Reagent field test (Bates #001524, 001527-28).

KAPLAN AND KAPLAN
ATTORNEYS AT LAW

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13	G	Photograph of two completed Fentanyl Reagents field tests (Bates #001525).
14	H	4/9/2018 Search Warrant Application and Affidavit to search 4385 Darling Hill Road and Affidavit (Bates #00000247-260).
15	I	4/17/2018 Search Warrant Application and Affidavit to search 90 parcels (Bates #00000081-166).

DATED at Burlington, Vermont this 4th day of February, 2019.

Respectfully Submitted By,

SAM BENT
By Counsel

KAPLAN AND KAPLAN

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